



WHEREAS both parties anticipate taking multiple expert witness depositions;

WHEREAS the parties have identified an issue impacting the scope of testimony to be provided by expert witnesses relating to the issue of damages and therefore require additional time to meet and confer about the issue so as to reach a possible agreement;

WHEREAS the parties need additional time to meaningfully conduct expert witness discovery thereafter;

WHEREAS the parties are still in active settlement negotiations with Justice Lambden of ADR Services following mediation on November 15, 2016, and would like to continue participating in settlement discussions;

WHEREAS the parties respectfully request that the Court continue the current expert discovery deadlines as outlined by the parties below, or as soon thereafter as the Court is available.

WHEREAS the continuance of the deadlines as proposed below will not impact the August 14, 2017 trial date, or any other deadlines set by this Court.

WHEREAS, alternatively, the parties request a CMC to further discuss these issues with the Court.

**STIPULATION**

THEREFORE, IT IS HEREBY STIPULATED THAT the expert rebuttal and expert discovery cutoff deadlines are continued as follows:

Event	Current Date	Proposed Date
Expert rebuttal	May 1, 2017	June 16, 2017
Expert Discovery Cutoff	May 15, 2017	June 30, 2017

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1 Dated: April 20, 2017

GORDON & REES  
SCULLY MANSUKHANI LLP

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3 By: /s/ Jennifer M. Lynch  
JENNIFER M. LYNCH  
4 Attorney for Defendant  
5 REGENTS OF THE UNIVERSITY OF  
CALIFORNIA

6 Dated: April 20, 2017

LEIGH LAW GROUP

7  
8 By: /s/ Jay Jambeck  
Jay Jambeck  
9 Attorney for Plaintiff  
KULGINDER SRAN

10 **~~[PROPOSED]~~ ORDER**

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12 According to the parties' stipulation, and good cause appearing, it is hereby ordered that  
13 the expert rebuttal and expert discovery cutoff deadlines of this matter are hereby continued as  
14 follows:

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Event	Current Date	Proposed Date
Expert rebuttal	May 1, 2017	June 16, 2017
Expert Discovery Cutoff	May 15, 2017	June 30, 2017

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19 IT IS SO ORDERED.

20 Dated: April 25, 2017

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Hon. Jon S. Tigar